

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DW 19-084

Pennichuck Water Works, Inc.
Permanent Rate Proceeding

MOTION TO EXTEND DEADLINES
FOR FILING DECEMBER AND JANUARY MONTHLY REPORTS

NOW COMES, Pennichuck Water Works (PWW) pursuant to Puc 203.07, Puc 202.04, and RSA 365:28 and hereby requests the Commission extend the deadlines for filing certain reports ordered to be filed by Order No. 26,383. In support of this request, PWW states as follows:

1. On July 24, 2020, by Order No. 26,383, the Commission approved a settlement agreement concerning PWW's revenue requirement and permanent rates. In that order, the Commission approved terms whereby PWW would file monthly reports within forty-five (45) days after the last day of the reported month.
2. On March 16, 2021, PWW requested modification of the reporting requirement for the December and January reports, noting that the report deadlines coincided with year-end closing of the Company's books and audit activities, thereby making it difficult to meet the 45-day deadline. The Commission approved this request by Secretarial Letter dated March 24, 2021.
3. In Docket No. DW 20-153 and Docket No. DW 20-156 concerning PWW's affiliate utilities Pittsfield Aqueduct Company, Inc.'s (PAC) and Pennichuck East Utility, Inc.'s (PEU) general rate cases, the Commission approved similar monthly, semi-annual, and annual reporting requirements. As the Commission is aware, through an existing affiliate and allocation

agreement, PAC and PEU use the PWW's employees to create the subject reports. The reporting deadline for both PAC and PEU's December and January reports were slightly extended in light of PWW's year-end reporting experience. See, *Pittsfield Aqueduct Company, Inc.*, Order No. 26,544 dated November 9, 2021 ("The Settling Parties agree and recommend that with respect to the reports for the months of December and January, the Commission allow until March 31st, instead of forty-five (45) days after the last day of the reported month for filing these reports.") *Pennichuck East Utility, Inc.*, Order No. 26,586 dated February 18, 2022 ("For the reports of December and January, PEU shall file the reports specified by March 31.")

4. PWW has recently filed a general rate case and anticipates a settlement agreement in that docket would otherwise include a similar deadline extension for the December and January reports, however, any settlement would likely occur after PWW needs to file the December and January reports. Therefore, PWW is requesting that the deadline extension to March 31st for the December and January reports be approved, separately, at this time.

5. PWW believes this modification to Order No. 26,383 is in the public interest because of PWW's past experience that the confluence of the monthly reporting deadlines, year-end closing activities, and audits, makes it difficult to meet a 45-day turn-around time for the December and January monthly reports. For example, accurate data is needed for the reports, however, year-end closing and audit activities cannot be completed in time for the January report. The December report is also contingent on year-end closing of the Company's books. Having accurate and complete data is necessary to meet the objective of the reporting requirement approved by the Commission in Order No. 26,383, which was to provide timely information concerning the effective implementation and oversight of the Material Operating Expense Factor. It would be in the public interest to file reports that are based on audited data.

6. PWW has reached out to the Department of Energy, Office of the Consumer Advocate and City of Nashua. The City of Nashua assents to the relief requested. The Department of Energy takes no position at this time. PWW did not receive a response from the Office of the Consumer Advocate at the time of this filing.

WHEREFORE, PWW respectfully requests the Commission:

- A. Issue an Order *nisi* extending to March 31st the deadline for filing the December and January Monthly reports; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

Pennichuck Water Works, Inc.

By its Attorney,
NH BROWN LAW, PLLC

Dated: July 19, 2022

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Certificate of Service

I hereby certify that a copy of the foregoing motion has been emailed this day to the docket-related service list.

Marcia A. Brown
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